

ORIGINAL

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

USDC SDNY
DOCUMENT

ELECTRONIC FILING

UNITED STATES OF AMERICA EX)		APR 18 2024
REL. HASSAN FOREMAN,)		
)		
Plaintiff,)		
)		
v.)	CIVIL ACTION NO. 16-cv-1960 (LLS)	
)		
AECOM; AECOM GOVERNMENT)	JURY TRIAL DEMANDED	
SERVICES, INC.; AC FIRST, LLC;)		
AECOM/GSS LTD, d/b/a GLOBAL)		
SOURCING SOLUTIONS, INC.)		
)		
Defendants.)		

**[PROPOSED] ORDER COMPELLING PRODUCTION OF DOCUMENTS RELATED
TO FREDDIE GREER'S TIMESHEET REVIEW**

LLS

The Court, having considered Relator's Letter Motion for Rule 37.2 Conference dated March 18, 2024 (Dkt. 169), Defendants' response letter dated March 25, 2024 (Dkt. 174), and Relator's reply (Dkt. 177), and the exhibits and declarations submitted therewith, hereby ORDERS the following:

1. Within fourteen (14) days from the date of this Order, Defendants shall conduct and complete an exhaustive search of all documents and communications in their possession, custody, and control for (1) documents underlying Freddie Greer's timesheet review from late 2013–early 2014, including Greer's work product, analysis, and results, and (2) email communications between Greer and Daniel Peters, whether made via Greer's work email account or his personal email accounts, relating to Greer's timesheet review.
2. Defendants shall use their best efforts to identify the set of timesheets that Greer actually reviewed as part of his timesheet review, and produce to Relator all hard

copy timesheets of employees working on the MOSC-A Contract for the pay periods ending on the following dates, with any and all "Post-It" or adhesive notes copied and also produced: 7/16/10, 12/31/11, 6/1/12, 3/22/13, 5/17/13, 5/31/13, 8/23/13, and 9/6/13.

3. Immediately following completion of the searches referenced above, Defendants shall produce to Relator all additional documents and communications located as a result of the searches.
4. Defendants shall submit a certification to the Court and Relator, signed by an officer of Defendants with knowledge of the facts, certifying that Defendants have completed the searches referenced above and, if Defendants claim that they cannot locate additional relevant documents and communications, Defendants' certification shall identify what categories of documents or communications they could not locate as part of their search and detail their efforts to search for these documents.
5. Defendants shall provide Relator with dates and times that Freddie Greer is available for a deposition within the two-week period following Defendants' supplemental production and certification.

SO ORDERED, this 18th day of April, 2024.

Louis L. Stanton
Hon. Louis L. Stanton
Senior United States District Judge